

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**In re:**

**HIGHLAND PROPERTY, LLC**

**Debtor.**

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**Case No. 23-22032**

**Chapter 11**

**OBJECTION TO THE DEBTOR'S MOTION TO APOINT REALTOR**

This firm represents Joseph Federer, who holds a secured claim against forty (40) properties owned by debtor. Debtor, under the direction of this court, has filed a motion to employ a realtor to assist in selling properties owned by the debtor which is returnable on July 9, 2024. Debtor has filed the motion to employ a realtor, however, has failed to include seventeen (17) properties which Joseph Federer holds a secured claim. Furthermore, the length of time and expense which would be expended to sell the entirety of the forty (40) properties which Joseph Federer holds a secured claim against would cause waste and a diminished value of each property to occur. Accordingly, Joseph Federer objects to the Motion to Appoint Realtor filed by Debtor.

Date: June 24, 2024

By: /s/ David B. Bassi  
David B. Bassi, Esq.  
Court I.D. 323306

I hereby certify that copies of this Objection to the Debtor's Motion to Appoint Realtor were served by ECF notice (electronically upon:

Debtor's Counsel:  
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